



June 19, 2012

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: Notice of Ex Parte Presentation in WT Docket 11-186

Dear Ms. Dortch:

On June 18, 2012, the following personnel from Pong Research Corporation (“Pong”)—Shannon Kennedy, PhD (President and Chief Executive Officer); Kevin Passarello (Executive Vice President and General Counsel); Ryan McCaughey, PhD (Chief Technology Officer); and Doron Gorshein (consultant to Pong)—had separate meetings with the following Federal Communications Commission (“Commission”) personnel: Renee Wentzel (Advisor to Chairman Genachowski) and Paul Murray (Advisor to Commissioner Rosenworcel).

At each of the meetings, the Pong representatives introduced Pong’s products and technologies. Pong’s wireless device cases are the only products commercially available that have been proven in Commission-certified laboratories to reduce user exposure to cell phone radiation, as measured on the Specific Absorption Rate (“SAR”) scale, while maintaining Total Radiated Power (“TRP”).

Pong also summarized the matters raised in its filing dated May 31, 2012 in Docket WT 11-186. In particular, Pong noted that wireless device cases can substantially impact wireless device transmission and reception (including TRP) and battery life, as well as SAR and, potentially, overall network efficiency. Consumers are generally unaware of these effects from cases.

Most wireless device users today use cases for their devices. After-market, form-fitting cases are neither tested nor assumed in the device equipment authorization process—but have become as integral to (and functionally are as much as part of) devices as original equipment manufacturer “shells.” The resultant “radiation profile” of a given device with a case may bear little resemblance to that of the same device without a case, as tested in the equipment authorization process. This altered profile, as well, might dramatically increase SAR and decrease TRP.

One step the Commission could take in light of these facts would be to update the equipment authorization testing guidelines to account for the presence of a case. The testing guidelines provide: “For purposes of evaluating compliance with localized SAR guidelines, portable devices should be tested or evaluated based on normal operating positions or conditions.” *Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields*, edition 97-01, August 1997, at page 42. An update would be appropriate as the testing guidelines were established in 1997 and last updated in 2001, based on a proceeding that commenced in 1996—prior to the proliferation of smartphones and (later) wireless device cases. Again, most consumers today use cases on their wireless devices.

Sincerely,

Kevin L. Passarello

EVP Business Development and General Counsel
Pong Research Corporation